1	DAVID LOY, Cal. Bar No. 229235 ANN CAPPETTA, Cal. Bar No. 354079		
2	FIRST AMENDMENT COALITION 534 4th Street, Suite B		
3	San Rafael, CA 94901-3334 Telephone: 415.460.5060		
4	Facsimile: 415.460.5155 Email: dloy@firstamendmentcoalition.org		
5	acappetta@firstamendmentcoalition	ı.org	
6	KEL MCCLANAHAN (<i>Pro Hac Vice</i>) NATIONAL SECURITY COUNSELORS		
7	1451 Rockville Pike, Suite 250 Rockville, MD 20852		
8	Telephone: 501.301.4672 Email: kel@nationalsecuritylaw.org		
9	Attorneys for Plaintiffs MSW MEDIA, INC. and		
10	FIRST AMENDMENT COALITION		
11			
12	UNITED STATES DISTRICT COURT		
13	NORTHERN DISTRICT OF CALIFORNIA		
14			
15	MSW MEDIA, INC., and FIRST AMENDMENT COALITION,	Case No. 3:25-cv-02881-AMO	
16	Plaintiffs,	DECLARATION OF KELLY MCCLANAHAN IN SUPPORT OF	
17	V.	PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO DISMISS OF	
18	UNITED STATES DOGE SERVICE, and	TRANSFER FIRST AMENDED COMPLAINT AND IN THE	
19	OFFICE OF MANAGEMENT AND BUDGET,	ALTERNATIVE, MOTION TO STAY	
20	Defendants.	Date: August 7, 2025 Time: 2:00 p.m.	
21		Judge: Hon. Araceli Martínez-Olguín	
22			
23	I, Kelly McClanahan, declare as follows:		
24	1. I am an attorney duly admitted <i>pro hac vice</i> to practice before this Court, an attorne		
25	with National Security Counselors, and one of the counsel of record for Plaintiffs MSW Media, In		
26	("MSW Media") and First Amendment Coalition ("FAC"). I make this declaration based on		
27	personal knowledge and if called as a witness I could and would testify competently to the facts		
28	stated herein.		

Case No. 3:25-cv-02881-AMO

- 1		
1	2. On June 9, 2025, FAC sent United States DOGE Service ("USDS"), through its	
2	counsel, a letter which stated that FAC formally joined the FOIA request submitted by MSW Media	
3	on February 11, 2025 as a joint requester, a true and correct copy of which is attached here to as	
4	Exhibit A.	
5	3. On June 9, 2025, MSW Media sent USDS, through its counsel, a letter which stated	
6	that MSW Media agreed to add FAC to its FOIA request submitted on February 11, 2025 as a joint	
7	requester, a true and correct copy of which is attached here to as Exhibit B .	
8	I declare under penalty of perjury under the laws of the United States of America that the	
9	foregoing is true and correct. Executed this 10th day of June, 2025 at Rockville, MD.	
0		
.1	/s/ Kelly McClanahan KELLY MCCLANAHAN	
2		
.3		
4		
.5		
6		
.7		
.8		
9		
20		
21		
22		
23		
24		
25		
26		
27		
28	Case No. 3:25-cy-02881-AMO	